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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

ALEX ANG and LYNNE STREIT,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

BIMBO BAKERIES USA, INC.,

Defendant.

Case No. 3:13-CV-1196-HSG

**STIPULATION EXTENDING PRE-TRIAL  
SCHEDULE; ~~PROPOSED~~ ORDER**

Judge: Hon. Haywood S. Gilliam, Jr.  
Action Filed: March 18, 2013

1 Pursuant to Northern District Rule 6-2, and subject to the Court's approval, Plaintiffs Alex  
2 Ang and Lynne Streit (collectively, "Plaintiffs") and defendant Bimbo Bakeries U.S.A., Inc.  
3 ("Defendant") (collectively "the Parties") respectfully submit the following Stipulation and  
4 proposed Order:

5 WHEREAS, the Parties are actively engaged in productive settlement negotiations;

6 WHEREAS, the Parties have stipulated to private ADR, with a deadline of August 30,  
7 2019, which the Court approved on May 31, 2019 (Doc. 207);

8 WHEREAS, Defendant designated expert witnesses on June 4, 2019;

9 WHEREAS, the deadline for the Parties to designate rebuttal expert witnesses is July 5,  
10 2019, and the deadline for expert discovery is August 5, 2019;

11 WHEREAS, the Parties have agreed to schedule a mediation before the Hon. Phillip M.  
12 Pro (Ret.) on July 31, 2019;

13 WHEREAS, counsel for the Parties have agreed that, in written mediation statements to  
14 be exchanged, Plaintiffs will identify any rebuttal expert witnesses they may designate;

15 WHEREAS, counsel for the Parties believe that a modest extension of the pre-trial  
16 schedule, including the date for rebuttal expert witness disclosures, will allow the Parties to  
17 conduct ADR before engaging in expert discovery and enable the Parties to avoid significant  
18 expense;

19 WHEREAS, there has been one extension of the pretrial schedule in this action (Doc.  
20 200); and

21 WHEREAS, the Parties agree that a further, modest, extension of the pre-trial schedule is  
22 warranted and will increase the likelihood of achieving a consensual resolution of this action.

23 THEREFORE, subject to the Court's approval, the Parties stipulate to the following  
24 extensions of the pre-trial and trial schedule and respectfully request that the Court enter the  
25 accompanying proposed Order:

26 Deadline to exchange rebuttal expert reports August 14, 2019

27 Expert discovery deadline September 30, 2019

1 Last day to file motion to compel expert discovery October 14, 2019  
2 Deadline to file dispositive motions October 21, 2019  
3 Deadline for opposition to dispositive motions November 18, 2019  
4 Deadline for replies to dispositive motions December 16, 2019  
5 Dispositive motion hearing deadline January 13, 2020  
6 Trial March 27, 2020  
7

8 Dated: June 28, 2019

9 /s/ Pierce Gore

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26 *Attorneys for Defendant*

27 **~~PROPOSED~~ ORDER**

28 Pursuant to Stipulation of the parties, and good cause appearing therefor, the Court hereby  
approves the Stipulation and enters it as an Order of the Court.

Dated: 7/1/19

  
Hon. Haywood S. Gilliam  
United States District Judge

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**ECF ATTESTATION**

I, Mark C. Goodman, am the ECF User whose ID and password are being used to file the following: **STIPULATION EXTENDING PRE-TRIAL SCHEDULE; [PROPOSED] ORDER**. In compliance with General Order 45, I hereby attest that Pierce Gore has concurred in this filing.

Dated: June 28, 2019

/s/ Mark C. Goodman  
Mark C. Goodman